

TODD W. BLANCHE  
U.S. Deputy Attorney General  
ALINA HABBA  
Acting United States Attorney  
JOHN T. STINSON  
Assistant U.S. Attorney  
401 Market Street, 4th Floor  
Camden, NJ 08101  
856-757-5139  
john.stinson@usdoj.gov

**UNITED STATES DISTRICT COURT  
DISTRICT OF NEW JERSEY**

Student DOE #1, *et al.*,

*Plaintiffs,*

v.

KRISTI NOEM, *et al.*,

*Defendants.*

Hon. Katharine S. Hayden

Hon. André M. Espinosa

Civil Action No. 25-2998 (KSH)(AME)

**NOTICE OF MOTION**

Motion day: October 14, 2025

TO: All counsel of record for Plaintiffs, *Student Does 1-6*

PLEASE TAKE NOTICE, that the Federal Defendants, sued in their official capacities, hereby move to dismiss the Amended Complaint in this matter, ECF No. 56, for lack of subject matter jurisdiction pursuant to Rule 12(b)(1) of the Federal Rules of Civil Procedure. This motion will proceed under the agreed-to schedule ordered by the Court. ECF No. 72. The next motion day following this agreed-to schedule is October 14, 2025.

In support of their motion, defendants will rely upon a brief as well as the Declaration of John Stinson with accompanying exhibits and declarations as well as all previously filed matter in this civil action.

PLEASE TAKE NOTICE, that the attorneys for the Federal Defendants filed these materials through the Court's ECF system on the date below, which caused a true copy of the same materials to be made available to all counsel of record.

Respectfully submitted,

TODD W. BLANCHE  
U.S. Deputy Attorney General

ALINA HABBA  
Acting United States Attorney  
Special Attorney

By: /s/ John T. Stinson  
JOHN T. STINSON  
Assistant United States Attorney

*Attorneys for Federal Defendants*

August 11, 2025